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Subject: VT Medicaid EHRIP Updates: 90-Day EHR Reporting Period Option Finalized; SRA Myths and Facts; PY2016 Resources

To All Vermont Medicaid EHR Incentive Program participants:

CMS RULE FINALIZED: 90-DAY EHR REPORTING PERIOD OPTION FOR PY2016 AND PY2017

CMS recently issued a [final rule](#) that contained a much-anticipated change to the EHR Incentive Program. As first proposed earlier this year, CMS has finalized a change that will allow all returning participants the option to utilize a 90-day Meaningful Use EHR Reporting Period in both Program Year 2016 (currently underway) and in Program Year 2017. The effective date of the rule is **January 1, 2017**. Updates to our MAPIR system to allow all program participants to attest with the 90-day EHR Reporting Period option will be completed by mid-January. We will let our program participants know when you can proceed with Program Year 2016 applications using the 90-day option.

SECURITY RISK ANALYSIS MYTHS AND FACTS

Providers attesting to Meaningful Use of their Certified EHR Technology system must demonstrate that they are protecting health information. Meaningful Use Objective #1 calls for providers to complete a Security Risk Analysis or review for each Program Year they are applying for an EHR Incentive Payment. There are many misconceptions about the requirements and timing for the SRA, and it is commonly cited as a risk factor for failed audits in the program overall. For example, here is a list of acknowledged **MYTHS** associated with objective:

- The security risk analysis is optional for small providers. (No)
- I only need to do a risk analysis once. (Nope)
- My EHR vendor took care of everything I need to do about privacy and security. (By no means.)
- Each year, I'll have to completely redo my security risk analysis. (Not true.)

Please review CMS's helpful [Security Risk Analysis Tip Sheet](#) that separates myth from fact, and be prepared for your Program Year 2016 EHRIP attestation.

VISIT THE CMS WEBSITE TO REVIEW RESOURCES ON 2016 PROGRAM REQUIREMENTS

CMS has created materials to help providers attest successfully to the EHR Incentive Programs in 2016, and assembled them at the [2016 Program Requirements](#) page. *Please be aware that CMS has not yet fully updated references to the "Full Calendar Year EHR Reporting Period," so remember the 90-Day option that has just been announced for 2016.*

- [Eligible Professionals \(EPs\) What You Need to Know for 2016 Tip sheets](#)
- [EPs MU Objectives Specification Sheets](#)
- [Alternate Exclusions Fact Sheet](#)
- [Health Information Exchange Fact Sheet](#)
- [Patient Electronic Access Tip Sheet](#)
- [EPs Public Health Reporting in 2016 Tip Sheet](#)
- [Guide for EPs Practicing in Multiple Locations](#)

If you are aware of anyone who would like to receive our EHRIP email updates, or if you would like to be removed from this distribution list, please forward the updated information to ahs.dvhaEHRIP@vermont.gov.

Don't hesitate to [contact the Vermont Medicaid EHRIP Team](#) with any questions, and be sure to check out the [Vermont Medicaid EHRIP website](#) for important information about the program.

Thank you,
Lorraine

Lorraine Siciliano

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